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April 14, 2022

**Via ECF**

Honorable Matthew J. Skahill, U.S.M.J.  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

RE: Levins v. Healthcare Revenue Recovery Group, LLC  
Docket No.: 1:17-cv-928-RBK-KMW  
Our File No.: 447-102973(SXK/CMS)

Dear Judge Skahill:

I represent Defendant in this matter. On March 24, 2022, the Court entered an Order requiring HRRG to produce four additional categories of information in the class spreadsheet previously provided. Specifically, Defendant was ordered to produce (1) the full name appearing as the "RP" in the DEBTOR section (indicating the party responsible for the debt); (2) the data populating the "CInt" field (indicating the identity of the creditor to whom the debt is owed); (3) the date and time for each call during the relevant time period; and, (4) the telephone number reported for each call during the relevant time period.

As it relates to number 3, the undersigned filed a letter on April 7, 2022 requesting reconsideration of the Court's Order. (ECF #105 requesting reconsideration of ECF #104). If this Order is not amended as requested in ECF #105, Defendant respectfully requests a brief extension of time to respond to request number 3. As indicated previously, HRRG's IT resources are very limited. The production of documents/information responsive to request number 3 would take in excess of 40 hours to prepare because manual intervention is required to obtain call logs.

HRRG estimates that it could not comply with this discovery request before the April 20, 2022 deadline. Instead, Defendant respectfully requests an extension of this deadline to **May 6, 2022**. Further, in fairness to Plaintiffs' required class certification deadline, Defendant also requests an extension of the class certification deadline to **June 6, 2022**.

{NJ312554.1}

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Plaintiffs' counsel, Philip Stern, Esq., consents to this request for a brief extension of deadlines. Thank you in advance for Your Honor's consideration in this matter.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

/s/ Jonathan R. Stuckel  
Christian M. Scheuerman, Esquire  
Jonathan R. Stuckel, Esquire

CMS/emm

cc: Philip Stern, Esquire